



**ESEA FLEXIBILITY WAIVER APPLICATION**  
**(ATTACHMENTS)**

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Office of the  
State Superintendent of Education (OSSE)

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# ATTACHMENT 1



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**Subject:** ESEA Flexibility Application Released for LEA/Public Comment  
**Date:** Thursday, January 19, 2012 8:10:00 AM  
**Attachments:** [OSSE ESEA Flexibility Application Draft 01-18.12.pdf](#)  
[OSSE ESEA Flexibility FAQs 01-18.12.pdf](#)

Dear LEA Representatives,

The Office of the State Superintendent of Education intends to submit a request for flexibility from certain requirements of the Elementary and Secondary Education Act (specifically amendments of No Child Left Behind) to the U.S. Department of Education by February 21, 2012. I am writing today to notify you that a draft of the District of Columbia's [ESEA Flexibility Request](#) is now posted publicly. At this link, you will see a statement from the State Superintendent regarding this release, inviting comments on the draft over the next four weeks (through February 14, 2012). You will also find the draft application attached here, along with a document with Frequently Asked Questions.

Please share this information with your agency's staff and stakeholders.

**Comments**

Local educational agencies wishing to comment on this proposed request should submit comments in writing either through [this link](#) (preferred) or by email at [OSSE.Comments@dc.gov](mailto:OSSE.Comments@dc.gov) by 5:00 PM on Tuesday, February 14, 2012. Any comments submitted will be included, without identifying information, in OSSE's request to the U.S. Department of Education.

All my best,

Jeremy Grant-Skinner, J.D.  
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***Bcc: DC LEA Representatives***



# ATTACHMENT 2



DISTRICT OF COLUMBIA  
PUBLIC SCHOOLS

Office of the Chancellor

TO: Kayleen Irizarry  
FROM: Pete Weber  
DATE: January 4, 2012  
RE: NCLB Waiver

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Thank you for the opportunity to provide feedback on the Office of the State Superintendent of Education's No Child Left Behind waiver application. We appreciate the hard work and thought you put into this application and are grateful for OSSE's leadership in this work.

I believe that the waiver application process provides The District of Columbia with two great opportunities. First, as a city with an improving systems of traditional public schools and a vibrant system of charter schools, DC has a great deal to be proud of. DCPS has seen double digit gains in reading and math at the elementary and secondary level over the past four years. We have implemented a teacher and principal evaluation system which serves as a model for the nation, and we are leading the way in implementation of the Common Core State Standards. The Charter schools in DC have similar successes to their credit. OSSE misses an opportunity to showcase these achievements in this waiver application. Because these successes align directly with priorities of the U.S Department of Education, including them in the application only helps to make our case and shows that we are already on track.

Second, the waiver application offers DC an opportunity to bring the city together to identify a discrete number of schools in need of dramatic improvement and to maintain focus on those schools until we see genuine improvement. DCPS and charter schools have both shown tremendous capacity to make improvements in schools. It should be the goal of this waiver application to identify a group of schools that are clearly in need of change and to support and advance the innovations that are occurring at the LEA level to address the needs of those schools.

Our concerns fall into four broad categories – accountability systems for schools, interventions in schools, human capital issues, and special education subgroups.

#### **Accountability Systems**

The NCLB waiver application identifies an array of factors that will go into determining which schools will be priority schools and focus schools. Without knowing which schools will be identified using this data, it is impossible to determine if the metrics are intuitively correct. However, even without this information, there are three general concerns.

First, the system is, on its face, overly complicated. While NCLB could be faulted for measuring all schools based only on progress towards AYP in reading and math, the proposed system leaves schools with a confusing array of factors to consider. The challenge in DC is not in identifying schools that would benefit from additional attention. Looking at a variety of measures may be a thoughtful means for an LEA to determine how to make improvements at a school. However, using this broad variety of measures leaves open the possibility that we will identify schools that may well not be our neediest.

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Second, many of the measures used are new to principals, have not been included in previous high stakes decisions, and have not been areas of focus previously. This is true for metrics such as the DC-CAS Biology score and the DC-CAS Composition score. Given that these measures are new from a school-wide accountability perspective, it would be wise to phase in their use. Schools should have at least a full school year after being informed of the metrics used to identify priority and focus schools to implement changes that could change their status. As a result, a phased in approach to school identification could help with the transition from the old system.

Finally, some of the data to be collected is subject to selection bias, challenging definitions, and difficulty in comparability between DCPS and charter schools. For example, we would need to develop a rule for tracking students who repeated 9<sup>th</sup> grade, but then progressed directly to 11<sup>th</sup> grade. Does that student count toward the 9<sup>th</sup> grade completion figure? We would also need to identify a consistent definition of graduation requirements so that all LEAs could track progress toward graduation in the same way. We would also need to determine if we want to incentivize AP test participation as much scoring a 3 or higher on an AP test. Using this metric in a high-stakes decision may change the way schools handle AP enrollment decisions.

Below is a list of additional concerns related to accountability metrics.

- For the 2011-2012 school year, DCPS has set targets for principals based on AYP in math and reading. Establishing a phased implementation would ensure that principals are not subject to several, inconsistent accountability metrics.
- Phasing in the addition of accountability metrics would allow DC to bridge between the current system and the proposed system while building in additional time for feedback and improved data integrity.
- There is no set of metrics for alternative high schools
- The proposed metrics use advancement to the next grade as a proxy for students being on track to graduate; however this is not always the case. Additional time and work could help establish a more meaningful metric.
- We should evaluate whether we want to look at a 5 or 6 year graduation rate. While the 4 year graduation should be the expectation, we do not want to set up an incentive system that gives up on students who are not on a four year track.
- Data for graduation rates (related to credits) are inconsistent between charters and DCPS.
- Given the complexity of the data it may be wise to propose a more general system with a commitment to build in adjustments by a date certain.
- It is unclear if OSSE can consistently track data like 9<sup>th</sup> grade completion rates between DCPS and charters.

### **Interventions**

DCPS has been very aggressive about pursuing interventions to help low performing schools. DCPS has reconstituted a significant number of schools, has changed school leadership in more than half of our schools, has implemented an instructional coach model, and has initiated partnership schools. While some of these interventions were completed with the authority granted under NCLB, DCPS was the driving force behind pursuing and implementing the reforms. Between DCPS and DC Charter Schools, there is a great deal of innovation in our educational interventions. Through the NCLB waiver process,



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the OSSE should seek to foster innovation at the LEA level and provide tools LEAs can use to improve schools. The OSSE should not be narrowly focused on process or compliance.

I have two general concerns about the approach proposed for intervening in low performing schools. First, the application proposes a dramatically increased role for the OSSE when compared to the role played under NCLB. Under the proposal within the waiver, the OSSE requires LEAs to conduct Quality School Reviews, to use the OSSE's online turnaround and management tool, to use CapStar, the district improvement planning and monitoring tool, and to participate in district practice reviews. This amounts to a very process heavy intervention strategy and in many cases is duplicative of what the LEA has already done. This adds undue burdens on LEAs and would force us to spend more attention on process over outcomes.

Second, while I was glad to see that Supplemental Education Services and NCLB School Choice are not featured as intervention models, very few of the intervention strategies listed show promise in improving schools. The application also does not account for prior work that an LEA has done to identify the needs of individual schools. DCPS has conducted Quality School Reviews for years. While these intensive check ups served a meaningful purpose at one time, given the rich data we have on student performance through paced interim assessments and DC-CAS scores, on teacher performance through IMPACT ratings, and on instructional practice from our instructional coaches, this model for information collection is no longer helpful. A much more abbreviated "desktop" QSR would be a more efficient means of collecting available data quickly.

Below is a list of additional concerns related to intervention strategies:

- The rewards section is trite and will not have a meaningful impact on school performance.
- The application is, overall, heavy on committees.
- It would be more beneficial to students for the OSSE to provide funding for good high quality PD instead of reviews.
- DCPS has, to date, avoided participating in the CAPSTAR system because it is not customizable and because we have an existing means of collecting data.
- Application does not contemplate how proposed interventions will mesh with prior interventions.

### **Human Capital**

DCPS has made work on human capital issues the cornerstone of our reform. From a model teacher evaluation system to a revolutionary teacher contract to meaningful performance pay, DCPS has been a national leader in addressing human capital in our schools. Much of this work has been supported by DC's Race to the Top grant. As a result, the waiver application draws liberally from the Race to the Top grant application. This is the correct approach. Where there are small differences between the two applications, I would like assurance that the inconsistent systems will not hamper DCPS' ability to continue innovating or create an overly confusing system of requirements.

### **Special Education**

Consistent with the notion that NCLB's use of subgroups may have identified schools unfairly for improvement; the OSSE's application eliminates sub groups and instead focuses on the lowest 25% of students at any given school. While this approach is clear, it ignores the historic challenges that DC schools in general, and DCPS in particular, have faced with regard to special education populations.

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Instead, the OSSE could consider looking at modified assessments (including read aloud assessments) for some special education students. In addition, given the challenges of special education students transferring from charter schools to DCPS school and from DCPS schools to non-public schools, we could look to measures of retention as a measure of success. Finally, the proposal to modify SEDS to accommodate drop down menus so that Common Core Standards can be incorporated into IEPs is an idea that deserves considerably more review before it is proposed in a waiver application.

We view this waiver application as the next step in our progress in reforming education in Washington DC. Done well, this waiver will give us a great opportunity to further target resources to the schools that are most in need and to implement interventions that will improve student learning. We are excited to work with the OSSE to ensure that we realize these important goals.





January 4, 2012

Kayleen Irizarry  
Assistant Superintendent of Elementary and Secondary Education  
Office of the State Superintendent of Education  
810 1<sup>st</sup> St., NE  
Ninth Floor  
Washington, DC 20002

Dear Ms. Irizarry,

PCSB staff appreciates the opportunity to comment on the Draft ESEA Waiver document. We appreciate the large amount of work that has evidently been put into this effort. We recognize that our recommendations below will require significant additional work, and are willing to pitch in to help writing new versions of the document.

Overall we believe the document has numerous issues that stem from the attempt to write it as though DC were a typical state comprised of numerous LEAs each of which contains district-run schools, as well as a small minority of students attending charter schools, whether through their own LEA or as part of a district LEA.

As you know, DC is very different. There is only one district LEA, DCPS, which serves 58 percent of the students. The remaining 53 LEAs are ALL charter school LEAs, and serve 42% of public school students, an amount four times higher than any other state.

This unique situation demands a unique approach to the ESEA waiver request. This approach should lead by emphasizing the fact that nearly half of DC students, and over 95% of DC's LEAs, attend charter schools that are a) schools of choice and b) are subject to closure in the case of poor academic performance. This in itself should be viewed highly favorably in any waiver review.

Once this unique situation is established, the waiver request should then lay out a system that explicitly treats charter schools differently. This different treatment in areas such as accountability and teacher evaluation offers two critical advantages. First, it protects and preserves the autonomies and operational flexibility of charter schools. Second, it avoids creating additional structures that could duplicate those already created by the PCSB and DCPS.

PCSB therefore strongly recommends that the waiver request be substantially revised to a) emphasize the unique nature of DC schools; b) explicitly distinguish between the treatment of charter and DCPS schools; and c) rely wherever possible on structures and systems developed or to be developed by PCSB and DCPS, rather than instituting additional, often redundant systems and structures at the OSSE level that could be burdensome and confusing to parents, teachers,



and school leaders.

Below are some specific examples where such a revision is needed to appropriately respect charter autonomy and avoid duplication, redundancy, and needless complexity. This is not meant to be an exhaustive list, but should give a good sense of how a comprehensive revision of the document might look:

1) **Transition to college and career-ready standards.** The document needs to emphasize that charter schools are subject to the CAS, which embodies the standards, but are not required to explicitly adopt a prescribed set of standards, and do not have to follow any specific subject progression, scope and sequence or curriculum. Moreover the document should make clear that the adoption of science in the common core will come in future years and generally should be clearer about the evolution of the DC CAS to reflect common standards. Charter schools have the option, but are not required to participate in any professional development offered by OSSE around the common core.

2) **State Developed Differentiated Recognition, Accountability and Support.** We do not believe that such differentiation needs to apply to charter schools beyond the PCSB's Performance Management Framework. The PMF is a robust system that meaningfully differentiates performance among schools. Its closure provisions are far more rigorous than any state district approach to turning around low-performing schools. Moreover the autonomy principles of charter schools prevent the application of mandatory technical assistance or other supports to be instituted by any body other than the PCSB. Nor should they be required to undergo district practice reviews, or be subjected to guided intervention or SIG. Moreover, we believe it is wholly unnecessary to create an additional accountability, support, reward, or penalty structure beyond the PMF. This includes "Focus" schools, "Reward" schools, a program to focus on the bottom 25 percent of students in each school, the development of AMO's, etc. As to whether it make sense to create a separate system for DCPS schools, in addition to DCPS's own assessment and accountability structures, we leave that to OSSE and DCPS to resolve.

We should note that the PMF will continue to evolve over time – incorporating additional college and career ready metrics, for example, and having more formal structure for alternative schools. Any waiver request should make this clear in a way that the continued evolution of the PMF is not constrained. And any waiver request should include the flexibility to administer alternate assessments to a broader range of special needs students than is currently permitted. To the extent the PMF needs to be modified to meet specific terms of the waiver requirements (e.g. reflection of performance of subgroups, etc.), we are open to considering such changes. In general you will find us flexible in working with OSSE, Charter LEAs, and DCPS in revising the PMF over time.

3) **While each school should have in place a teacher evaluation system, the choice of system, its elements, or the HR practices associated with such a system are solely the choice of the charter school (other than those who have signed up for specific commitments under Race to the Top).**

This set of comments is obviously just the beginning of a more extensive set of discussions. We look forward to working with OSSE to build the strongest possible ESEA waiver proposal – one that preserves charter autonomy, avoids redundancy and duplication, and offers the best opportunity to deliver quality educational choice to DC students and their families.

Sincerely,



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Brian Jones  
Board Chair



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Jeremy Williams  
Acting Executive Director



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Scott Pearson  
Incoming Executive Director



## Irizarry, Kayleen (OSSE)

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**From:** ndeveaux@dcpubliccharter.com  
**Sent:** Wednesday, February 08, 2012 11:30 PM  
**To:** Irizarry, Kayleen (OSSE); Noel, Jeffrey (OSSE); Reavis, Tamara (OSSE)  
**Cc:** spearson@dcpubliccharter.com; Swinburn, Cate (DCPS); Sutter, Jessica (EOM); rcane@focusdc.org  
**Subject:** ESEA Flexibility Waiver Application--PCSB's Notes  
**Attachments:** ESEA\_Waiver\_Response\_02\_08\_12 FINAL.docx

Hi Kayleen,  
It's still Wednesday according to my clock--and here is PCSB's text for inclusion in the ESEA Waiver Application.

All the additional information was gathered from discussions with public charter school leaders and advocates and from PCSB staff.

Principle 1 we have a few comments and one-liners and questions, which we hope you will answer.  
Principle 2 we substantially rewrote the section where it relates to PCS oversight.  
Principle 3 we included the necessary text to cover PCSs.

I am glad you offered us this opportunity and appreciate knowing that you and your team will either include the text as is or will work with us to modify. I have included the document in Word format so that you can easily cut and paste into your current version.

When do you plan to have your "final" draft ready for review?

Naomi

PS--David and others are working on the AMOs--Accountability Index--tomorrow. We are hopeful that the smart group can come up with a reasonable solution that meets the ESEA requirements.

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\*\*\*\*\*

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**DC Public Charter School Board's Response to the District of Columbia ESEA Flexibility Waiver Request—Draft 01-18-12**

As per OSSE's request, this document contains text that should be included in each section of the waiver application. Please contact Naomi DeVeaux if you have questions.

Before signing off on the Waiver application, PCSB and public charter schools would like to know the state's plan for delivering on "Assurance #5" "It will report annually to the public on college-going and college-credit accumulation...".

Charters are especially concerned about how OSSE will collect and report data for students attending schools not in the Clearinghouse database.

**Principle 1:**

Add a section about science standards.

"The District of Columbia's science standards are among the best we have seen; they are excellent across the board." – Fordham Study

(<http://www.edexcellence.net/publications/the-state-of-state-science-standards-2012.html>)

Schools raised questions about the integrity of the science test.

The PCSB still is adamant that the state NOT include more high-stakes testing before the year 2014-2015, when the PARCC will be introduced. Schools would much prefer have a brand-new accountability system put into place that year that includes science than have a changing testing landscape every year between now and 2015. We think it would be much easier for parents and the public to understand as well if we mitigated the changes to our DC CAS between now and 2015.

Regardless, you must add language about the validity and reliability of the DC CAS in Science and composition when you are going to include it in 2015, and how the changes to the DC CAS in reading (2012) and math (2013) will (or will not) effect school performance and growth scores and the reliability and validity of the test to be used for capturing growth and achievement.

The timeline section should include additions for science and composition and the potential impact this will have on schools' ability to show proficiency and growth.

“OSSE is also providing RTTT funding to DC Public Schools in its school turnaround work, applying one of four turnaround models to the persistently lowest-achieving 5% of schools as well as the broader lowest-achieving 20% of schools. OSSE plans to increase capacity and provide additional support to the lowest-achieving 20% of schools through a newly formed Office of Innovation and Improvement.”

**What is the “newly formed ‘Office of Innovation and Improvement’” and this office only supports the bottom 20% of DCPS schools, not all schools. Please explain, given that PCSB is responsible for the monitoring the PCSs—even those in the lowest 20%.**

p 24

Need to add “participating” before any mention of an LEA creating or implementing anything that is part of RTTT.

p 25

mentions a bill introduced to council that will require all students to take either the SAT or ACT and apply to college. This can only apply to DCPS. **Omit mention of this bill.**

#### **Principle 2a**

Keep page 29-32 of current waiver application.

#### **Language to ADD:**

The Office of the State Superintendent of Education (OSSE) does not currently implement a state-level accountability system in addition to Adequate Yearly Progress Reports. Instead, the Public Charter School Board (PCSB), the chartering authority with oversight over 53 of the 54 Local Education Agencies by law, has created and implemented an accountability system for monitoring its schools. Therefore, OSSE has partnered with the PCSB and will use its Performance Management Framework as a component of its statewide accountability system for differentiated accountability and supports.

p 30—

Please clarify if you are using NAEP TUDA or NAEP state data and, if this is NAEP TUDA data, that only has DCPS schools included in the 2011 release. **Need to clarify.**

p 30-31 good use of NAEP data in this section.

p 32 Good list of policy changes. Add:

PCSB is nationally recognized for having an aggressive closure rate. In the past four years, PCSB has closed between 2 and 4 schools each year. In all, one-third of all public charter schools have either had their charters revoked or voluntarily



surrendered their charters under pressure from their authorizer. When implementing its new Performance Management Framework in SY2011-2012, PCSB also implemented a transparent policy for closing standard schools for poor academic performance. Note that PCSB's aggressive closure policy was recently featured in the NACSA annual report on "the State of Charter School Authorizing."

p 33 Need to add year in AYP chart

Page 34 bullet 1 – Wrong information about the PMF.  
Replace:

### **Public Charter School Accountability**

The Public Charter School Board (PCSB) holds public charter schools accountable using its recently-developed and -implemented Performance Management Framework (PMF). The purpose of this framework is to provide a fair and comprehensive picture of a charter school's performance using common indicators and to use these results to reward higher achieving schools and support or close the lower achieving ones. The PMF currently divides public charter schools into three tiers based on their performance on statewide assessments and other indicators. The framework is designed to take into account both the autonomy and huge variety of public charter schools and therefore only includes performance outputs. It is also designed to hold schools to higher accountability standards; it uses higher floors and ceilings than is typical in a state system. School reports are publicly released each school year.

Schools currently earn points in four categories: student progress, student achievement, gateway measures, and leading indicators. The PCSB commits to adding the newly developed Accountability Index that OSSE is creating as a 5<sup>th</sup> category of the PMF, as this will incorporate subgroup performance and ensure that all schools are reducing the achievement gaps that exist both within their schools and across the city. This addition to the framework will be phased in over time, beginning in the 2013-2014 school year. Below is a description of each section of the PMF:

### **Student Progress**

*This measure is also on the DCPS School Score Card.*

Student progress measures how much a student's performance has improved from one year to the next, relative to other students. Progress is measured using the statewide growth model, first adopted in 2011. The Median Growth Percentile (MGP) model assesses student's growth in Reading and Math on the DC CAS in grades 3-8 and 10. The Office of the State Superintendent of Education provides the MGP results for all students in the state and validates the scores before releasing the charter school results to PCSB for inclusion in the PMF. A student's growth percentile is first calculated to measure how much a student's performance has

improved from one year to the next, relative to students statewide with similar DC CAS scores in prior years. The model determines whether a student grew at a faster, slower, or similar rate than the students' peers. The school-level MGP is calculated by taking the median of all student growth rates within the school. For school year 2010-2011, student progress accounts for 40 points in elementary and middle schools and 15 points in high schools, where the emphasis is on achievement and college success measures.

### **Student Achievement**

*This measure is also on the DCPS School Score Card.*

Student achievement is a measure of the percent of students scoring proficient or advanced in Reading and Math on the DC CAS (3<sup>rd</sup> through 8<sup>th</sup> grade for elementary and middle schools, and 10<sup>th</sup> grade for high schools). The Office of the State Superintendent of Education provides the validated DC CAS performance data to PCSB for inclusion in its framework. For high schools, achievement on AP and IB exams are also included in this measure, so as to provide a fuller picture of academic achievement. In school year 2010-2011, student achievement is worth for 25 points for elementary and middle schools and 30 points for high schools.

### **Gateway Measure**

*This measure aligns with the Common Core State Standards for Career and College Readiness*

Gateway measures reflect outcomes in key subjects that, for elementary and middle schools, predict future educational success. For high schools, gateway measures reflect outcomes aligned to a student's predicted success in college and/or a career. For elementary and middle schools the measure captures students' success in mastering reading, writing and math as measured by the DC CAS in 3<sup>rd</sup> grade reading and 8<sup>th</sup> grade math; for high schools it is a measure of the graduation rate, PSAT performance in 11<sup>th</sup> grade, SAT performance in 12<sup>th</sup> grade, and the college acceptance rate. The Office of the State Superintendent of Education provides the valid DC CAS data and the College Board provides the PSAT and SAT data. In 2010-2011, the Gateway indicator is worth 15 points for elementary and middle schools, and 30 points for high schools.

### **Leading Indicators**

*This measure is also on the DCPS Score Card as part of School Climate*

Leading indicators are a measure of a school's overall climate as measured by their attendance and re-enrollment rates. High schools are also measured by the percent of 9<sup>th</sup> graders with credits on track to graduate. These factors are seen as predictors of future student progress and achievement and are directly related to a school's overall performance. In 2010-2011, leading indicators are worth 20 points for elementary and middle schools, and worth 25 points for high schools.

### **Accountability Index**

*This measure is also on the DCPS School Score Card.*



As part of the ESEA Flexibility Waiver application, OSSE is developing and implementing a new Accountability Index, that takes into account student achievement and growth and weights the performance by subgroup. **FILL IN LANGUAGE HERE AFTER INDEX IS CREATED.**

#### **PMF Performance Tiers**

Using a 100-point scale and based on the scores for the academic scoring screen, standard schools will be identified as Tier I (high-performers), Tier II (mid-performers), Tier III (low-performers) or Tier IV (lowest-performers). In School year 2010-2011, Tier I schools earn at least 65% of the possible points. Tier II schools earn between 35% and 64% of the possible points. Tier III schools earn less than 35% of the possible points. Tier IV will be added in SY2012-2013 and be reserved for the lowest performing public charter schools. A school must meet the threshold for points for each tier. The threshold points for identifying each tier will be revised every year through a transparent process, with the aim to continue to raise the bar while adjusting to a new state assessment, PARCC in SY 2014-2015, new national science standards, and changes to the state-defined Annual Measurable Objectives.

Under current PCSB policy, Tier IV schools are subject to immediate closure, and tier III schools are subject to closure within one year if their PMF scores decline significantly or within two years if they do not improve to at least Tier II. These actions will occur independent of whether a school is designated priority or focus.

The image below represents the current configuration of a PMF School Performance Report scorecard; AMO would be added to the existing indicators.

Student Progress
Student Growth
Gateway
Leading Indicators
AMO

Page 35-36

Remove all language about the statewide accountability framework. Replace with an explanation of how the Accountability Index will rank schools and identify the bottom 5% for priority, and the next 15% for focus, and the top 10% for reward. Remove language calling schools “continuous improvement” and replace with “in good standing”.

p 35

Remove the long list of data OSSE commits to make publicly available; this looks like a scorecard.

Schools that are “continual improvement” should be renamed as “in good standing” and will not be forced to undergo prescribed interventions.

### **SCHOOLS IN GOOD STANDING**

Based on the accountability index, schools not identified as priority or focus schools and who do not earn reward school status will be designated as schools in good standing. This group represents charter schools that are successfully implementing their educational program and will most likely fall in Tier I and II of the Performance Management Framework. Their success comes from their ability to leverage their autonomy and individually pursue improvement strategies. It is the expectation that these schools are independently following the continuous improvement cycle and will need little to no intervention from the OSSE or PCSB. Rather, these LEAs have access to charter support organizations and OSSE-sponsored trainings, as well as PCSB support, if needed. If schools fail to improve on the PMF, they will eventually fall into Tier III, when PCSB will start enforcing stricter monitoring practices, as described in the Performance Management Guidelines. (WE CAN ATTACH THIS TO THE WAIVER AS AN APPENDIX.)

### **Principle 2b--AMOs**

This section needs to be rewritten after the Accountability Index has been created.

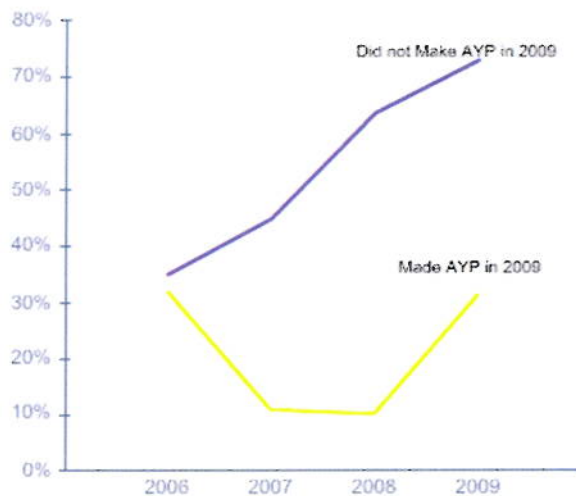
Here is intro language to focus on our biggest need, students with disabilities:



X% of the District's public schools serve at least 25 (the required group size to count as a subgroup for NCLB) economically disadvantaged students and another X% serve at least 25 students with special education students. Very few of these schools are able to make Adequate Yearly Progress. The few that have made AYP in recent years have done so through the Safe Harbor provision in the No Child Left Behind Act in at least one subgroup. Friends of Choice in Urban Schools, a local school choice advocacy organization, explained the limitations of AYP through this tale of two schools below:

### About AYP

Percentage of Students Scoring Proficient or Advanced on DC CAS  
SY2006-2009



#### What is Adequate Yearly Progress (AYP)?

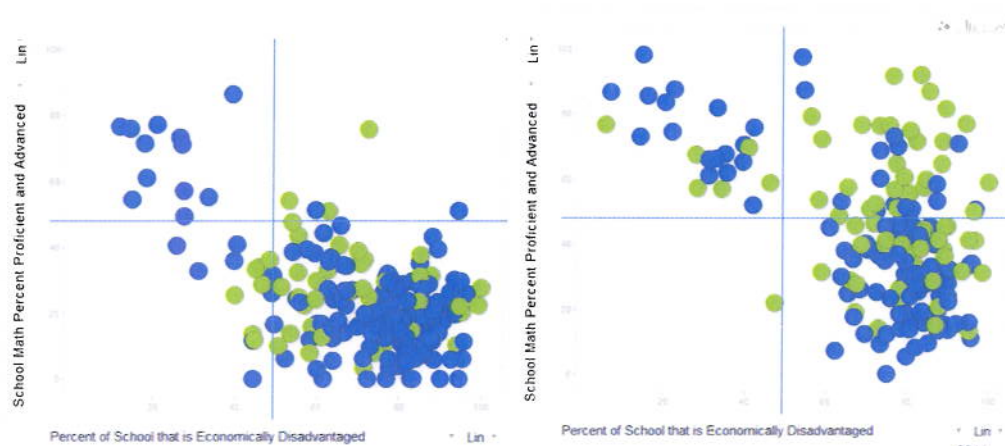
AYP is the key measure of public school academic success under the federal law called the No Child Left Behind Act (NCLB). To "make AYP" a school must demonstrate proficiency in all student subgroups: white, Asian/Pacific Islander, African American, Hispanic, limited English proficient, economically disadvantaged, and special education. A school makes AYP when it meets the target for the percentage of students in all subgroups that score "proficient" or "advanced" on the state test or when the number of students who are not proficient in a subgroup decreases by 10% (referred to as "Safe Harbor").

#### Why is AYP a poor school performance measure?

This graph shows that 73% of the students at the purple-lined school scored proficient or advanced, vs. 31% at the yellow-line school made AYP through Safe Harbor, the high-performing school "failed" because one student subgroup missed the 2009 AYP target. This is a common occurrence: in any given year schools with fewer than half of their students scoring proficient or advanced "make AYP" through Safe Harbor, while schools that are much closer to getting every child to proficiency do not

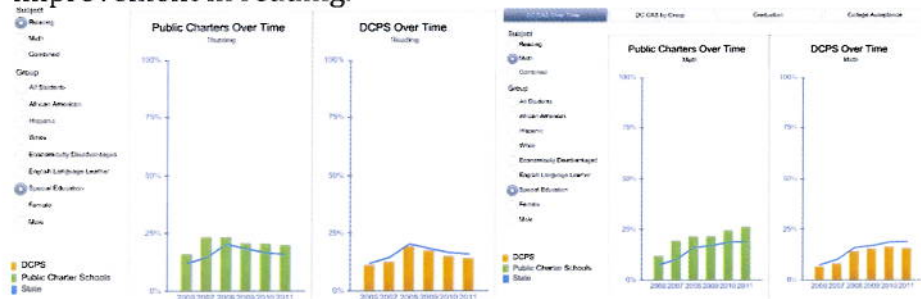
It is no surprise that Safe Harbor is how many schools are showing progress—the progress that is occurring in D.C. is primarily in subgroup populations. The graphs below show that D.C.'s public schools are improving their percent proficient. In 2006, only 15 schools had a percent proficient in math higher than 50%—and all but a few had low percentages of low-income students. By 2011, this number has almost tripled, with 63 schools having higher than 50% proficient in math and 40 of them with poverty rates greater than 50%. These data clearly show that the District's charter and traditional public schools are closing the achievement gap.

INSERT MATH GRAPHS SIDE BY SIDE (INCLUDE LEGEND) – "Performance over time" at [focusdc.org/performance-over-time](http://focusdc.org/performance-over-time)



Having the opportunity to reset the AMOs, using 2010-2011 data as baseline data, and promising to reduce by half the percentage of students who are currently scoring basic or below basic on the DC Comprehensive Assessment System in reading and math as measured by achievement and growth seems like a reasonable and achievable way for capturing school progress for most students. However, it will most likely not solve our biggest concern, serving students with disabilities.

While we are seeing movement among many subgroups, the special education subgroup is showing a much slower rate of improvement in math, and no improvement in reading.



In order to help schools focus on this group and at the same time not unnecessarily punish schools with larger percentages of students with disabilities, the Accountability Index weighs growth for special ed student....**FILL IN LANGUAGE.**



## **Principle 2.ci—Priority Schools**

### **Monitoring Charter Schools' Academic Performance**

Pursuant to the SRA §38-1802.13 (a), the PCSB has the discretion to revoke the charter of a school that is failing to meet its goals and student academic expectations. Based on the Accountability Index, public charter schools will be given a designation by the Office of the State Superintendent of Education. Because the PCSB's Performance Management Framework and OSSE's Accountability Index use the same underlying data—growth and achievement on the DC CAS—and the Accountability Index will become part of the PMF, we expect to see alignment between the PMF Tiers and the OSSE's designation. **ADD DATA FROM 2010-2011 TO CONFIRM.**

The PCSB has two choices when confronted with a OSSE-designated priority school—either have it be a candidate for revocation or intensely monitor its ability to turn itself around and remove itself from priority status. If OSSE finds that PCSB is unable to do its job with fidelity, it has the right, after four years, to take over the monitoring of a priority school and enforce its School Improvement Guidelines on the school.

### **Accountability for Public Charter Schools**

Using the OSSE-designated Accountability Index, priority schools will be struggling to implement their program with fidelity, evidenced by low growth, low achievement, and/or low graduation/attendance for all students or for specific subgroups of their population. The DC Public Charter School Board knows that priority schools will fall into one of two categories: unsuccessful schools that are candidates for revocation or minimally successful schools that, with mandated supports and more frequent monitoring, have the capacity to remedy their performance gaps. Because of the unique differences among charter schools and the autonomy given to them under the School Reform Act (SRA), support for minimally successful schools requires intensive focus on the particular needs of an individual school and their right to choose the best path forward, given their educational philosophy and mission. As such, the DC Public Charter School Board intends this support to include a four-step process:

#### **Step One: Assess**

The DC Public Charter School Board, using historical and current outcome data embedded in its performance management frameworks for finance, compliance, and academics, coupled with qualitative data gathered through school visits, will make an initial determination on whether the school is a candidate for A. Charter Revocation or B. Intensive Support.

## **Step Two: Implementation**

### **A. Charter Revocation:**

For schools with the most severe underperformance, the DC Public Charter School Board will pursue charter revocation, under its authority in section 38.1802-13 of the School Reform Act. The charter revocation process begins with a mid-year vote on proposed revocation. Should this vote pass, families are notified of the school's status and the school is given the opportunity for a public hearing on the matter. The public hearing provides the school with the chance to state its case and allows all stakeholders to speak on the proposed revocation. Within 30 days of the public hearing, the DC Public Charter School Board votes on the proposed revocation. Should this vote pass, the DC Public Charter School Board staff prepares for an end of school year closure along multiple fronts, including enrollment and finance. PCSB staff work with other government agencies, charter support organizations, and the school to notify parents of the closure and secure placements for *all* students in public schools. Special consideration is made when working with families who have students with special needs. Enrollment specialists work to ensure that all documentation are updated and that parents understand their rights. The current timeline gives parents the opportunity to apply for enrollment to other charter schools and out-of-boundary DCPS schools for the following school year. PCSB will also help schools with their finances and will require them to submit interim financial statements and plans for terminating bank accounts and lines of credit. DC Public Charter School Board reconciles all billings and payments with the Office of the Chief Financial Officer.

### **B. Intensive Support**

Schools that are assessed at having the internal capacity to improve based on multiple indicators will be required to craft an action plan. Charter schools will have the autonomy to develop their own actionable strategies that are aligned with their mission and educational philosophy and fall within the current constructs of their charter agreement. Action plans will be reviewed by PCSB staff prior to implementation and will be approved by the PCSB Board.

Charter schools will be responsible for implementing their action plan designed to address the needs of specific subgroups or their entire



school population. DC Public Charter School Board will require the school to solicit services from a PCSB-endorsed third party to help it address its weaknesses. As dictated by law, charter schools are granted autonomy and this autonomy extends to the rights of charter LEAs to seek partnerships with any of the charter support organizations in the District to aid in the implementation of their plan.

**Step Three: Progress Monitoring**

The DC Public Charter School Board will monitor the progress of schools toward their goals outlined in their implementation plan. Because public charter schools are governed by independent boards of trustees, the PCSB will work directly with the school's board when monitoring interventions. Working with the school board, the PCSB will develop strategies for monthly monitoring, which may include onsite visits, review of interim assessment data, and an examination of other relevant data to measure the effectiveness of the intervention strategies. The DC Public Charter School Board will, whenever possible, align its monitoring with the third party consultant so as to disrupt the school as little as possible. Staff may join meetings, attend walk-throughs or coaching sessions, board meetings, and otherwise monitor the implementation of the intervention. Priority schools will be required to engage with the DC Public Charter School Board in regular discussions of progress.

In partnership with the Office of the State Superintendent of Education, the DC Public Charter School Board will also monitor the expenditures of school funds. Priority schools will be required to submit detailed monthly accounting reports of funds spent toward action items. Based on the action plan and data provided by the school on the effectiveness of implemented strategies, the DC Public Charter School Board will offer guidance and/or correction to schools. A thorough review will allow the DC Public Charter School Board to make recommendations to OSSE on the dispersal of 1003(a)/(g) to schools for reimbursement.

**Step Four: Re-Assess**

At the end of this cycle, the DC Public Charter School Board, in collaboration with the priority school, will assess the progress made in the whole school and/or subgroup performances and decreases in achievement gaps. As an authorizer, the DC Public Charter School

Board respects the autonomy of charter schools and is committed to measuring the success of outputs not the value of inputs. In this way, the DC Public Charter School Board will use the school's new Accountability Index score and its performance on the PMF and make a recommendation for charter revocation, continued intensive support, or reduced monitoring. Schools can become candidates for charter revocation if they are, once again, designated as a priority school or show a decrease in academic performance, as measured by a summative PMF score, or remain in Tier III for three of five years.

OSSE reserves the right to directly monitor priority schools that PCSB does not either close or move out of priority status within five years.

#### **2.C.ii—Focus Schools**

**This section is contingent on re-working the Accountability Index so that only the schools that fall between the lowest 20% and 5% of all schools fall into this category.**

#### **Accountability for Public Charter Schools**

Using the Accountability Index, which accounts for performance across subgroups, the Office of the State Superintendent of Education will identify focus schools. Those charter schools designated as focus schools will most likely fall in Tier III on the Performance Management Framework. They are therefore subject to closure under current PCSB policies as described above. Scoring within this range indicates that these schools may be struggling to implement their program, evidenced potentially by low growth, low achievement, and/or low graduation/attendance for all students or for specific subgroups of their population. **ADD DATA FROM 2010-2011 to verify.**

Public charter schools are schools of choice that have exclusive control over their curriculum, instruction, personnel and finance, so, in a true sense of autonomy, these schools will be given choices to improve their performance. The wide variety of supports available to schools gives schools plenty of options. The DC Public Charter School Board views focus schools as those that, with additional support, have the capacity to remedy their performance gaps. Because of the unique differences among charter schools, this support requires intensive focus on the needs of an individual school. Furthermore, as outlined in the School Reform Act, as amended, charter schools have the autonomy to implement an academic program aligned with its mission and operate the school as it sees fit. As such, the DC Public Charter School Board intends this support to include a four-step process:

#### **Step One: Assess**



The DC Public Charter School Board, using historical and current outcome data embedded in its performance management frameworks for finance, compliance, and academics, coupled with qualitative data gathered through school visits, will make an initial determination on what type of support the school requires to improve its performance.

**Step Two: Implementation**

Charter schools will be responsible for implementing an action plan designed to address the needs of specific subgroups or their entire school population based on an analysis of data. As dictated in law, charter schools are granted autonomy; this autonomy extends to the rights of charter LEAs to seek partnerships with any of the charter support organizations in the District to aid in the implementation of their plan. As cited in a survey conducted by the New Schools Venture Fund in 2011, many organizations, such as The Achievement Network and the DC Special Education Cooperative, were rated high by Tier I schools. The DC Public Charter School Board will facilitate partnerships between these organizations and focus schools, based on needs identified in the action plan. Support garnered from these organizations offers charters designated as focus schools with an additional layer of assistance that exists beyond the influence of the authorizer. Regardless of potential partnerships, it falls within the auspices of charter LEAs to implement action items and assess progress in whole school and/or subgroup performance.

**Step Three: Progress Monitoring**

The DC Public Charter School Board will monitor the progress of schools toward their goals. Strategies for quarterly monitoring include onsite visits, review of interim assessment data, and an examination of data on the effectiveness of strategies chosen by the school. Ratings on the success of the implementation will be followed with a review of the action plan, and possible adjustments. Focus schools will be required to track interim assessment data by subgroup performance and engage with the DC Public Charter School Board in discussions of progress made throughout the year. Additionally, focus schools will be required to develop metrics for assessing the efficacy of strategies outlined in the action plan and tracking their success.

In partnership with the Office of the State Superintendent of Education, the DC Public Charter School Board can also monitor the expenditures of school funds. Focus schools will be required to

submit detailed quarterly accounting reports of funds spent toward action items. Based on the action plan and data provided by the school on the effectiveness of implemented strategies, the DC Public Charter School Board will offer guidance and/or correction to schools. A thorough review will allow the DC Public Charter School Board to make recommendations to OSSE on the dispersal of 1003(a)/(g) to schools for reimbursement.

#### **Step Four: Re-Assess**

At the end of this cycle, the DC Public Charter School Board, in collaboration with the focus school, will assess the progress made towards improvements in whole school and/or subgroup performance and decreases in achievement gaps. As an authorizer, the DC Public Charter School Board respects the autonomy of charter schools and is committed to measuring the success of outputs not the value of inputs. In this way, the DC Public Charter School Board will the school's new Accountability Index score and its performance on the PMF and make a recommendation for charter revocation, continued support, or reduced monitoring. Schools can become candidates for charter revocation if they are, once again, designated as a focus school, designated as a priority school, show a decrease in academic performance, as measured by a summative PMF score, or remain in Tier III for three of five years.

OSSE reserves the right to directly monitor focus schools that PCSB does not either close or move out of focus status within five years.

#### **Principle 2.c.iii—Reward Schools**

Those schools designated as “reward schools” will most likely earn Tier I status<sup>1</sup> on the Performance Management Framework. Based on the weights enumerated above, schools earn the majority of points towards their score by showing growth and proficiency on state-mandated assessments. Accordingly, schools with high growth and/or high proficiency rates that actualize the original intent of the School Reform Act which is for District of Columbia public schools (inclusive of charter schools) to “become a world-class education system that prepares students for lifetime learning in the 21<sup>st</sup> century” will be acknowledged by the DC Public Charter School Board.

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<sup>1</sup> Tier I schools that have not shown high growth/high achievement and/or have shown a decline in subgroup performance will be required to develop an action plan, as outlined in the system of support for “focus schools.”



The DC Public Charter School Board, as the sole authorizer of charter schools, will recognize and reward the high performing and high progress schools in multiple ways:

- Efficient pathways to replication: The DC Public Charter School Board will support and encourage the highest performing schools to replicate by developing an alternative, more efficient pathway. This includes amending the request process with a decrease in administrative asks, shortening the timeline, and assisting schools in pursuing charter school start-up funds by providing letters of support to foundations and banks.
- Access to facilities: Based on a 2011 survey by New Schools Venture Fund of charter sector needs, Tier I-rated schools cited “facility support” within their top ten needs. In partnership with the Office of the State Superintendent of Education and the District government, the DC Public Charter School Board will assist schools in acquiring facilities for schools in unstable short-term situations or buildings with inadequate space to meet their programmatic needs.
- Public recognition: The DC Public Charter School Board will acknowledge the success of its reward schools” through multiple mechanisms, including:
  - Charter school awards gala
  - Press releases; postings of status to the DC Public Charter School website/facebook page/twitter feed
- High Profile Opportunities
  - Invitations to special events (e.g. White House Egg Roll)
  - Chosen for site visits when distinguished international and national guests visit
  - Tickets for special events for students, teachers, and leadership
- Financial awards: At the 2011 Josephine Baker Awards for Charter School Excellence and through financial donations, the DC Public Charter School Board was able to grant financial rewards to those schools who demonstrated the highest overall performance and highest overall growth on the Performance Management Framework for the 2010-2011 school year, in two categories: elementary/middle schools and high schools. The DC Public Charter School Board will continue to reward the most successful charter schools financially, in support of their stellar programming. This is in complete alignment with the survey by New Schools Venture Fund in which Tier I schools named philanthropic support as their greatest need, while simultaneously rating current philanthropic support efforts as next to last in terms of quality.

### **Principle 3—Teacher Evaluation**

Public charter schools are autonomous schools that have exclusive control over their personnel. In D.C., all public charter school employees are at-will employees and can be hired and fired at any time during the school year. The schools know that their success lies almost exclusively on the caliber of their teaching staff, and they go through great pains to attract and hire the absolute best from across the nation. Still, it is not easy to find the right fit, and therefore, teachers must be evaluated regularly and lower performing ones must be either supported or released.

While schools that signed on to RTTT agreed to pilot and implement teacher evaluation systems, some public charter schools chose not to receive the funding because they did not want to give up their exclusive control over their personnel, among other autonomies. In fact, the highest performing, the most innovative, and those that serve alternative populations make up the majority of the non-RTTT LEAs. Of the 29-odd charter campuses that did not sign up for the funding, 15 serve untested populations such as early childhood, adults and disengaged youth working toward GEDs. Of the remaining 14 that do serve tested grades, half of them are considered “tier 1” by the PCSB’s Performance Management Framework and all but one are out-performing the state average. These schools include nationally recognized programs such as the Achievement Prep, Two Rivers, Washington Latin, Howard University Math and Science Middle School, Washington Math Science and Technology, Washington Yu Ying and the SEED School.

Because of the rights granted to them under the School Reform Act of 1995, these non-RTTT schools are exempt from the ESEA Flexibility Principle 3 requirements of creating teacher evaluation system as long as they are not designated as priority schools. In addition, all RTTT schools in good standing are exempt from any additional requirements not currently in the RTTT MOU.

If a school does fall into priority status, the school will submit a teacher evaluation plan to the PCSB for approval. The PCSB will ensure that the evaluation system will meet the requirement of the waiver application both on paper and in implementation and will include it when monitoring the school’s progress.

Specifically, the PCSB will require the school to produce a teacher and principal evaluation system that will:

1. be used for continual improvement of instruction
2. have at least three performance levels
3. use multiple, valid levels of performance, including student growth as a significant factor
4. evaluate teachers and principals on a regular basis
5. provide clear, timely and useful feedback
6. be used to inform personnel decisions.



## PCSB Response to ESEA Waiver (February 8, 2012)

Failure to produce a satisfactory teacher evaluation system may result in charter revocation.

## Walker, Valida (OSSE)

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**From:** Bessler, Robin (OSSE)  
**Sent:** Monday, January 30, 2012 12:08 PM  
**To:** OSSE Comments (OSSE)  
**Subject:** Waiver Feedback sent to Basecamp

Reply ABOVE THIS LINE to add a comment to this message

**Project:** [District of Columbia Title I Committee of Practitioners](#)  
**Company:** District of Columbia Title I Committee of Practitioners



Christina Yuknis commented on the message:

### [Flexibility Waiver Comments](#)

I read through the waiver application (finally!). Overall, I think it is very clear and well-written. I just have a couple of questions.

1. On page 14 - How will "partnering with universities" happen? There is not much discussion of that. (Maybe not appropriate for the application, but something to consider for implementation.) I do not expect a huge amount of partnering with Gallaudet, but certainly some as there are deaf children being educated in the DC public schools.
2. On pages 20 - 21 "Special Populations" - What about students with disabilities who are not in the 1% but who are still significantly below grade level?

Robin Bessler  
Education Policy and Compliance Specialist, Teaching and Learning  
Elementary and Secondary Education  
Office of the State Superintendent of Education  
810 First Street NE, #5025C  
Washington, DC 20002  
202.724.5239 (Desk)  
202-506-0802 (Mobile)  
202.741.6412 (Main OSSE)  
202.741.0227 (facsimile)  
[Robin.Bessler@dc.gov](mailto:Robin.Bessler@dc.gov)

[www.osse.dc.gov](http://www.osse.dc.gov)

### Join Mayor Gray at the One City Summit on February 11, 2012

Let Your Voice Be Heard – Help the District become a more livable, vibrant, and inclusive city – for everyone.

Open to all DC residents

Sign up at [www.onecitysummit.dc.gov](http://www.onecitysummit.dc.gov)





# ARCHDIOCESE OF WASHINGTON

Archdiocesan Pastoral Center: 5001 Eastern Avenue, Hyattsville, MD 20782-3447  
Mailing Address: Post Office Box 29260, Washington, DC 20017-0260  
301-853-4500 TDD 301-853-5300

January 31, 2012

Ms. Hosanna Mahaley  
Office of the State Superintendent of Education  
810 First Street NE, 9<sup>th</sup> Floor  
Washington, DC 20002

Dear Ms. Mahaley,

I am writing to you regarding the state's application to the U.S. Department of Education for waivers of provisions of the Elementary and Secondary Education Act (ESEA). By way of this letter, I want to share with you my thoughts concerning the implications of waivers on the equitable participation of private school students. The Archdiocese of Washington serves over 6,000 students in 21 schools in the District of Columbia and all schools receive services under ESEA.

As you are aware, ESEA does not permit the equitable participation of private school students to be waived. However, other actions could affect private school students' participation in Title IA programs.

Private and public school students generate funding for Title IA in the same manner—low-income students residing in Title IA attendance areas generate funds. When, through the waiver authority, funds are freed up that had previously been used for required set asides, it is important that the needs of the private school students be considered in the determination of the new use of those funds.

After reviewing the January 18, 2012 draft application posted on your website, I am concerned that there is no mention of equitable participation for students who attend non-public schools. Additionally in the consultation section there is no mention of consultation with non-public schools.

In the introductory sections of the application, I request that the following language be inserted as a means of protecting the equitable participation of eligible private school students:

Ms. Hosana Mahaley  
Page Two  
January 31, 2012

*Continued provision of equitable services for eligible Title I students attending nonpublic schools is an important consideration in the implementation of this plan. As a result, we are directing each local educational agency with Title I eligible children attending nonpublic schools to expend an equitable share of any funds the agency designates for priority and focus schools, in addition to the funds already designated for equitable services. If the LEA decides to transfer Title IIA funds, private school students will still benefit from at least the percentage of allocated Title IIA funds that was received under equitable participation in 2011-12.*

Prior to the allocation of any freed up funds, the district has the obligation to consult with private school officials and consider the needs of private school students prior to making any decision regarding expenditure of these funds. These topics should be added to the agenda of ongoing consultation or a special consultation meeting should be scheduled.

The waiver authority also calls for review of the state's application from a wide range of stakeholders. Because of the importance of equitable participation in the Title I program, I ask that you include private school officials in this review process. Reviewers representing the interests of private school students in the Title I program should be those with experience in the program participation of private school students. I am happy to serve in this capacity and/or suggest others that are appropriately qualified.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Bert L'H", with a long horizontal flourish extending to the right.

Deacon Bert L'Homme, Ph.D.  
Superintendent for Catholic Schools

Enclosure

c: Dr. Kayleen Irizarry, Assistant Superintendent, Elementary and Secondary Education



# Schools in the Archdiocese of Washington SY 2011-12

DISTRICT OF COLUMBIA

MONTGOMERY COUNTY

PRINCE GEORGES COUNTY

SOUTHERN MARYLAND

Early Childhood Programs		MC Early Childhood Programs		PGC Early Childhood Programs		Solid Early Childhood Programs	
0	DC Early Childhood Programs	1 PK Resurrection Church Preschool	1 PK Palloiti Early Learning Center (Independent) 2 PK St. Jerome Child Center	1 PK Christian Beginnings Preschool 2 PK Good News Preschool 3 PK Our Lady's Little Christians Preschool 4 PK St. Mary, Star of the Sea Preschool			
Total Early Childhood Program Schools = 0		Total Early Childhood Program Schools = 1		Total Early Childhood Program Schools = 2		Total Early Childhood Program Schools = 4	
DC ELEMENTARY ARCHDIOCESAN SCHOOLS Consortium of Catholic Academies		MC ELEMENTARY ARCHDIOCESAN SCHOOLS		PGC ELEMENTARY ARCHDIOCESAN SCHOOLS		SOMD ELEMENTARY ARCHDIOCESAN SCHOOLS	
1 PK-8 Sacred Heart School	1 PK-8 Holy Cross School	1 PK-8 Holy Redeemer School	1 PK-8 Holy Family School	1 PK-8 Holy Redeemer School	1 PK-8 Cardinal Hickey Academy	1 PK-8 Our Lady, Star of the Sea School	
2 PK-8 St. Anthony School	2 PK-8 Little Flower School	2 PK-8 Mary of Nazareth School	2 PK-8 Mount Calvary School	2 PK-8 St. Ambrose School	2 PK-8 Charles County		
3 PK-8 St. Francis Xavier School	3 PK-8 Our Lady of Lourdes School	3 PK-8 Our Lady of Mercy School	3 PK-8 St. Jerome School	3 PK-8 St. John the Evangelist School	3 PK-8 Archbishop Neale School		
4 PK-8 St. Thomas More Catholic School	4 PK-8 St. Andrew Apostle School	4 PK-8 St. Bernadette School	4 PK-8 St. Joseph School	4 PK-8 St. Mary of the Mills School	4 PK-8 St. Peter School		
1 PK-8 Annunciation School	5 PK-8 St. Catherine Labourer School	5 PK-8 St. Elizabeth School	5 PK-8 St. Mary Assumption School	5 PK-8 St. Mary of the Mills School	6 PK-8 Father Andrew White, SJ School		
2 PK-8 Blessed Sacrament School	6 PK-8 St. Francis International Academy	6 PK-8 St. Francis International Academy	6 PK-8 St. Mary School of Piscalaway	6 PK-8 St. Mary School of Piscalaway	7 PK-8 Little Flower School		
3 PK-8 Holy Trinity School	7 PK-8 St. John the Baptist School	7 PK-8 St. John the Baptist School	7 PK-8 St. Philip the Apostle School	7 PK-8 St. Philip the Apostle School	8 PK-8 Mother Catherine Spalding School		
4 PK-8 Our Lady of Victory School	8 PK-8 St. John the Evangelist School	8 PK-8 St. John the Evangelist School	8 PK-8 St. Pius X Regional School	8 PK-8 St. Pius X Regional School	9 K-8 St. John's School		
5 PK-8 St. Ann's Academy	9 PK-8 St. Jude Catholic School	9 PK-8 St. Michael the Archangel			10 PK-8 St. Michael School		
6 PK-8 St. Augustine School	10 PK-8 St. Martin of Tours School	10 PK-8 St. Patrick School					
7 PK-8 St. Peter's Interparish School	11 PK-8 St. Mary School	11 PK-8 St. Peter School					
	12 PK-8 St. Michael the Archangel	12 PK-8 St. Patrick School					
	13 PK-8 St. Martin of Tours School	13 PK-8 St. Peter School					
	14 PK-8 St. John the Evangelist School	14 PK-8 St. Pius X Regional School					
	15 PK-8 St. John the Evangelist School						
	16 PK-8 St. Jude Catholic School						
	17 PK-8 St. Martin of Tours School						
	18 PK-8 St. Mary School						
	19 PK-8 St. Michael the Archangel						
	20 K-8 St. Patrick School						
	21 K-8 St. Peter School						
	22 PK-4 St. Raphael School						
Total ADW Elementary Schools = 11		Total ADW Elementary Schools = 22		Total ADW Elementary Schools = 16		Total ADW Elementary Schools = 10	
DC ELEMENTARY INDEPENDENT SCHOOLS		MC ELEMENTARY INDEPENDENT SCHOOLS		PGC ELEMENTARY INDEPENDENT SCHOOLS		SOMD ELEMENTARY INDEPENDENT SCHOOLS	
1 LT. Joseph P. Kennedy Institute	1 1-8 Brookwood Academy	0	0	0	0	0	
2 6-8 St. Anselm's Abbey School	2 6-8 Connelly School of the Holy Child						
3 6-8 San Miguel Middle School	3 1-8 Mater Dei School, Inc.						
4 6-8 Washington Jesuit Academy	4 K-8 Mother of God School						
5 6-8 Washington Middle School for Girls	5 PK-8 Stone Ridge School of the Sacred Heart						
	6 3-8 The Avalon School						
	7 3-8 The Heights School						
	8 PK-8 The Woods Academy						
Total Independent Elementary Schools = 5		Total Independent Elementary Schools = 8		Total Independent Elementary Schools = 0		Total Independent Elementary Schools = 0	
Total Elementary Schools = 16		Total Elementary Schools = 31		Total Elementary Schools = 17		Total Elementary Schools = 14	
ADW HS		MC SECONDARY ARCHDIOCESAN SCHOOL		PGC SECONDARY ARCHDIOCESAN SCHOOL		SOMD SECONDARY ARCHDIOCESAN SCHOOL	
1 9-12 Archbishop Carroll High School	1 9-10 Don Bosco Cristo Rey	0	0	0	0	0	
Total ADW High Schools = 1		Total ADW High Schools = 1		Total ADW High Schools = 0		Total ADW High Schools = 0	
DC SECONDARY INDEPENDENT SCHOOLS		MC SECONDARY INDEPENDENT SCHOOLS		PGC SECONDARY INDEPENDENT SCHOOLS		SOMD SECONDARY INDEPENDENT SCHOOLS	
1 9-12 Georgetown Visitation Preparatory School	1 9-12 Academy of the Holy Cross	1 9-12 Bishop McNamara High School	1 9-12 DeKalbe Catholic High School	1 9-12 St. Mary's Ryan High School			
2 9-12 Gonzaga College High School	2 9-12 Brookwood Academy	2 9-12 DeKalbe Catholic High School	2 9-12 Elizabeth Seton High School				
3 9-12 St. Anselm's Abbey School	3 9-12 Connelly School of the Holy Child	3 9-12 Elizabeth Seton High School					
4 9-12 St. John College High School	4 9-12 Georgetown Preparatory School	4 9-12 St. Vincent Pallotti High School					
	5 9-12 Our Lady of Good Counsel High School						
	6 9-12 Stone Ridge School of the Sacred Heart						
	7 9-12 The Avalon School						
	8 9-12 The Heights School						
Total Independent High Schools = 4		Total Independent High Schools = 8		Total Independent High Schools = 5		Total Independent High Schools = 1	
Total High Schools = 5		Total High Schools = 9		Total High Schools = 5		Total High Schools = 1	
Total DC Schools = 21		Total MC Schools = 40		Total PGC Schools = 22		Total SOMD Schools = 16	

## Walker, Valida (OSSE)

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**From:** angelabeth@gmail.com on behalf of Angela Stepancic <astepancic@wmsgdc.org>  
**Sent:** Thursday, February 02, 2012 2:33 PM  
**To:** OSSE Comments (OSSE)  
**Subject:** Equitable Participation for Private Schools

Greetings-

My name is Angela Stepancic and I represent Washington Middle School for Girls. Students in my school currently participate in federal education programs under ESEA. As you are aware, ESEA does not permit the equitable participation of private school students to be waived. However, other actions could affect private school students' participation in Title IA programs. Private and public school students generate funding for TitleIA in the same manner—low-income students residing inTitle IA attendance areas generate funds.

When, through the waiver authority, funds are freed up that had previously been used for required set asides, it is important that the needs of the private school students be considered in the determination of the new use of those funds. Will you please ensure continued equitable participation for private schools students in Title I and IIA is included in your waiver application?

Angela B. Stepancic, M.Ed.

*Always react with grace.*



## Walker, Valida (OSSE)

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**From:** Sheila Martinez <principal@olvschooldc.org>  
**Sent:** Saturday, February 04, 2012 6:57 AM  
**To:** OSSE Comments (OSSE)  
**Subject:** ESEA

Students in my school currently participate in federal education programs under ESEA. As you are aware, ESEA does not permit the equitable participation of private school students to be waived. However, other actions could affect private school students' participation in Title IA programs. Private and public school students generate funding for Title IA in the same manner—low-income students residing in Title IA attendance areas generate funds. When, through the waiver authority, funds are freed up that had previously been used for required set asides, it is important that the needs of the private school students be considered in the determination of the new use of those funds. Will you please ensure continued equitable participation for private schools students in Title I and IIA is included in your waiver application?

Sheila Martinez  
Principal  
Our Lady of Victory School  
4755 Whitehaven Parkway NW,  
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Tel: 202 337 1421  
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